

**Homelessness Prevention  
Recordkeeping and Reporting Requirements**

DHCD ESG Homelessness Prevention recipients and sub-recipients (sub-contractors) must comply with the following requirements and procedures to ensure compliance with the homeless definition set forth by HUD and the Request for Responses issued by DHCD. Both sets of requirements are incorporated into all DHCD ESG contracts. Additionally, DHCD has set caps on assistance and is targeting those most in need of services. As such DHCD requires all sub-recipients to adhere to the reporting guidelines below. Prior to authorizing any ESG service or financial assistance, the documentation listed in the following sections must be obtained and copied for the case record. HUD requires the order of priority be:

- (1) First, third-party documentation, signed and dated, on the documenting organization's official letterhead;
- (2) Second, intake worker observations;
- (3) Third, certification from the person seeking assistance

The costs of Homelessness Prevention services are only eligible to the extent necessary to help the household regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

<b>Category for Reporting</b>	<b>Required Documentation for Homelessness Prevention</b>
1. Documentation of At-Risk of Homelessness Eligibility Status	<p>ESG Homelessness Prevention funds may only be used to serve households which:</p> <ol style="list-style-type: none"><li>1. Have income below 30% of the applicable Area Median Income (AMI) at time of intake; and</li><li>2. Are not eligible for Emergency Assistance (EA).<sup>*</sup> EA eligibility criteria can be found at 106 CMR: 309.020. These standards are posted at <a href="http://www.mass.gov/dta">www.mass.gov/dta</a> and can be viewed by selecting the <i>Program Eligibility Charts and Tables</i> link under Key Resources; and</li><li>3. Are currently housed and have received a <u>Writ of Summary Process</u>; and</li><li>4. Lacks resources and/or support networks, e.g., family, friends, faith-based or other social networks.</li></ol> <p>No exceptions will be made to the Writ of Summary requirement. Households temporarily staying with friends or family are not eligible for assistance.</p>

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<p>Documentation of At-Risk of Homelessness Eligibility Status (Continued)</p>	<p>The ESG RFR stated that families fleeing, or attempting to flee, domestic violence were eligible for homelessness prevention services. However, DHCD has learned since the publication of the RFR that these households are to be served through the ESG Rapid Re-housing component NOT the Homelessness Prevention component. As such, households fleeing DV should not be served with Homelessness Prevention funding unless the other eligibility criteria are met. Rather they should be referred to a DHCD Rapid Re-housing program for immediate services.</p> <p>*Please note: Documentation that the household does not qualify for EA does not need to be provided. Rather, the intake agency should familiarize themselves with general EA eligibility criteria &amp; ask the household if they have applied for Emergency Assistance. <b>Please DO NOT require households to provide documentation of non-EA eligibility prior to offering ESG services.</b></p> <p><b>No exceptions will be made to the Writ of Summary requirement.</b></p>
<p>2. Income Verification</p>	<p>Households must have an <b><u>annual income of less than 30 percent of the Area Median Income</u></b> (AMI) at <b>intake</b> to qualify for ESG assistance.</p> <p>Households must have an <b><u>annual income of equal to or less than 30 percent of the Area Median Income</u></b> (AMI) at <b>re-certification</b> to continue to receive ESG assistance.</p> <p>Annual income must be calculated from current (the most recent 30 day period) and complete income information, for each member of the household and documented on an <u>annual</u> income evaluation form per the HUD Interim Rule.</p> <p>The following documentation of annual income must be gathered at intake and updated on a quarterly basis:</p> <ol style="list-style-type: none"> <li>(1) Annual income evaluation form containing the minimum requirements specified by HUD and completed by the ESG provider at intake and each subsequent recertification; <b>AND</b></li> <li>(2) Source documents for the assets held by the household and income received over the most recent period for which representative data is available before the date of the evaluation (<i>e.g.</i>, wage stubs, unemployment comp. statement, public benefits statement, bank statement);</li> </ol>

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<p>Income Verification (Continued)</p>	<p>(3) To the extent that source documents are unobtainable, a written statement by the relevant third party on the company or organization's letterhead (<i>e.g.</i>, employer, government benefits administrator) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party of the income the household received over the most recent period for which representative data is available; <b>OR</b></p> <p>(4) To the extent that source documents and third party verification are unobtainable, a self-declaration of income completed by each adult in the household stating the amount of income the household received for the most recent period AND a written certification from the intake worker or other staff member at re-certification documenting the efforts made to obtain third party verification of income. The statement by the intake worker or other staff member must document the efforts made to obtain verification of income and must be signed and dated by the appropriate staff person and the ESG household's adult members.</p>
<p>3. Documentation of Insufficient Financial Resources and Support Networks</p>	<p>All DHCD ESG case records must include the most reliable evidence available to show that the household does not have sufficient resources or support networks; <i>e.g.</i>, family, friends, faith-based or other social networks, immediately available to prevent eviction and maintain housing stability and that 'but for' the ESG assistance the household would become literally homeless. Documentation of Insufficient Financial Resources and Support Networks must be placed in each households file both at intake and at each quarterly re-certification.</p> <p>See "But For" Certification form.</p>
<p>4. Serving Households with a Housing Voucher or other form of Housing Assistance paid with Public Funds</p>	<p>Households in housing with publicly assisted rental assistance may only receive up to \$2,000 in financial assistance.</p> <p>Households receiving public rental assistance are eligible for services under the housing relocation and stabilization services component unless the participant is receiving the same type of assistance through other public sources at the same time.</p> <p>Households receiving public rental assistance are only eligible for a one-time payment of rental arrears on the tenant's portion of the rental payment under the short-term &amp; medium-term rental assistance component, unless they are re-located to a unit where no public rental assistance is offered.</p>

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<p>5. Participant Sustainability</p>	<p>The costs of homelessness prevention services are only eligible to the extent that the assistance is necessary to help the ESG participant regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.</p> <p>Recipients and sub-recipients are responsible for documenting that households receiving DHCD ESG Homelessness Prevention services can reasonably be expected to maintain the housing assisted through ESG for at least 12 months after ESG assistance ends.</p> <p>Eligible households should be able to demonstrate enough income each 30 day period to pay rent, any utilities not included in the rent, transportation costs, and purchase food.</p>
<p>6. Housing Relocation &amp; Stabilization Services</p>	<p>ESG services should be provided only to the extent necessary to prevent homelessness for an individual or family by stabilizing the household within that housing unit or relocating them to a more appropriate unit. Recipients and sub-recipients must keep clear records of the types of housing stabilization and relocation services provided under the ESG program and the amounts spent on those services and assistance.</p> <p>Eligible households may receive the following services under the housing relocation and stabilization services component of DHCD's Homelessness Prevention programs:</p> <ol style="list-style-type: none"> <li>1. Rental application fees*</li> <li>2. Security deposits (up to 1 month's rent)*</li> <li>3. Last month's rent (this assistance must not exceed one month's rent and must be included in calculating the households total rental assistance)*</li> <li>4. Utility deposits (gas, electric, water, and sewage)*</li> <li>5. Utility payments, including up to 6 months of utility payments in arrears. (A partial payment of a utility bill counts as one month. Utility assistance may only be provided if a member of the household has an account and proof of responsibility to make utility payments.)</li> <li>6. Moving Costs (This may include truck rental or hiring a moving company)*</li> <li>7. Housing search and placement*</li> <li>8. Housing stability case management</li> <li>9. Mediation</li> <li>10. Legal services (the services must be necessary to resolve a legal problem that prohibits the participant from remaining in their current unit or relocating to another unit of permanent housing )</li> </ol>

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<p>Housing Relocation &amp; Stabilization Services (Continued)</p>	<p>*Services with an asterisk should only be offered if re-locating the household is absolutely necessary to prevent homelessness.</p> <p><b>DHCD limits the amount of financial assistance provided to a household at \$2,000 if the household resides in or is moving into subsidized housing and \$4,000 if the household resides in or is moving into unsubsidized housing.</b></p> <p>Financial assistance may not be provided to a household who is receiving the same type of assistance through other public sources at the same time, including RAFT, HomeBase, and/or public rental assistance.</p>
<p>7. Relocating a Homelessness Prevention Eligible Household</p>	<p>Eligible households may receive assistance with moving to a new unit if it is determined that the household is not able to remain stably housed in their current unit and must move to prevent homelessness.</p> <p>Recipients and sub-recipients must clearly demonstrate that without ESG assistance to re-locate, the household would become literally homeless.</p> <p>A one-time payment of rental arrears may be provided to an eligible household that is re-locating with ESG assistance <b>ONLY</b> if the payment of the rental arrearage is necessary to prevent the household from becoming literally homeless.</p>
<p>8. Short-term and Medium-term Rental Assistance</p>	<p>ESG services should be provided only to the extent necessary to prevent homelessness for an individual or family by stabilizing the household within that housing unit or relocating them to a more appropriate unit. Recipients and sub-recipients must keep clear records of any short-term and medium-term rental assistance services provided under the ESG program and the amounts spent on those services and assistance.</p> <p>Eligible households may receive the following services under the short-term and medium-term rental assistance component of DHCD's Homelessness Prevention programs:</p> <ol style="list-style-type: none"> <li>1. Short-term rental assistance (up to 3 months of rent)</li> <li>2. Medium-term rental assistance (4-24 months of rent)</li> <li>3. One-time payment for up to 6 months of rent in arrears (these do not need to be consecutive months)</li> </ol> <p><b>DHCD limits the amount of financial assistance provided to a household at \$2,000 if the household resides in or is moving into subsidized housing and \$4,000 if the household resides in or is moving into unsubsidized housing.</b></p>

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Short-term and Medium-term Rental Assistance (Continued)	Financial assistance may not be provided to a household who is receiving the same type of assistance through other public sources at the same time, including RAFT, HomeBase, and/or public rental assistance.
9. Housing Stability Case Management	<p>Monthly housing stability case management services must be offered to every ESG eligible household with the intent of assisting the household in preventing homelessness and maintaining long term housing stability. A plan must be developed to assist the household with retaining permanent housing after ESG assistance ends, taking into account the household's current and/or expected income and expenses, and other public or private assistance for which the household may be eligible.</p> <p>The following documentation shall be maintained in each household's case record to document case management services offered through ESG:</p> <ul style="list-style-type: none"> <li>· creation of a Housing Stability Plan</li> <li>· creation of a personalized budget, taking into consideration the participants current and expected income and all expenses</li> <li>· documentation of monthly meetings with the case manager*</li> <li>· notes and/or copies of referrals to mainstream benefits and other resources and follow up notes on whether the household was able to access the service/benefit</li> </ul> <p>*A sub-recipient may be exempt from the monthly meeting requirement if the Violence Against Women Act of 1994 or the Family Violence Prevention and Services Act prohibit the sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.</p>
10. Lease Documentation	A legally binding, <u>written</u> lease for the unit between the <b>owner</b> and the household is required prior to authorizing any payment under the rental assistance component, excluding rental arrears, to the property owner. A written lease or documentation of an oral agreement is also required for clients that reside in public housing or receive some form of public rental assistance.

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<p>Lease Documentation (Continued)</p>	<p>The lease <b>MUST</b> include the following items:</p> <ul style="list-style-type: none"> <li>• Tenant name</li> <li>• Address of unit</li> <li>• Term of tenancy</li> <li>• Move in date</li> <li>• Rent amount</li> <li>• Responsibility for utilities</li> <li>• The lease must be signed and dated by all appropriate parties</li> </ul> <p>Only when the assistance is solely for rental arrears may an oral agreement be accepted in place of a written lease and <b>only if</b> the oral agreement gives the household an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented in the case record by the property owner's financial records, rent ledgers or cancelled checks. The oral agreement must then be documented in the case record on the organization or property owner's official letterhead. The letter must include the tenant name, address of the unit, monthly rent amount, responsibility for utilities, tenant move in date, term of tenant occupancy, and it must be signed and dated by the property owner and/or the sub-recipient.</p>
<p>11. Ownership</p>	<p>Proof of current ownership of the unit must be obtained prior to any financial payments made to the property owner. Documentation of ownership may include a copy of a deed, water bill, mortgage payment, or tax bill.</p>
<p>12. Rental Agreement between Sub-recipient and Property Owner</p>	<p>A rental assistance agreement between the property owner/landlord and recipient or sub-recipient must be in place prior to executing any service under the rental assistance component (including rental arrears).</p> <p>Per HUD requirements, this agreement must set forth the terms under which assistance will be provided. The agreement must also provide that, during the term of the agreement, the property owner must give the ESG recipient or sub-recipient a copy of any notice given to the household to vacate the unit used under state or local law to commence an eviction action against the household, including a 14 day notice to quit.</p>

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13. Housing Standards	<p><b>Documentation of Housing Standards applies to all Homelessness Prevention programs, including TPP.</b></p> <p>The records must include documentation of compliance with HUD’s shelter and housing standards. Completion of a housing standards inspection checklist completed by a staff person OR a copy of an inspection report completed by a HUD certified inspector, for the unit the household resides in or is moving into, must be in the case record for all clients receiving <b><u>any type</u></b> of ESG service.</p> <p><u>Housing and Lead Based Paint* standards apply for all households receiving RRH services under ESG, including rental arrears only, or legal assistance only.</u></p> <p>*Lead Based Paint visual assessments must be completed on all units receiving assistance if constructed before 1978 <u>AND</u> a child under 6 or a pregnant woman will live there. Documentation of the visual inspection completed by qualified staff must be kept in the case record. All staff members that will be responsible for completing visual assessments must have documentation that they are qualified to do so. HUD offers an online visual assessment training that should be completed by all staff members conducting inspections. The certification of completion by staff members should be kept with the sub-recipients ESG administrative records.</p> <p>The training can be found at:  <a href="http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm">http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm</a>.</p>
14. FMR & Rent Reasonableness	<p>Fair market rent and rent reasonableness must be met for all household receiving rental assistance, including first month’s rent. ESG requires housing units to meet BOTH rent reasonableness standards AND HUD’s published Fair Market Rent standards. Fair Market Rent established by HUD may be found at:  <a href="http://www.huduser.org/portal/datasets/fmr.html">http://www.huduser.org/portal/datasets/fmr.html</a></p> <p>For purposes of calculating rent under rent reasonableness standards, the rent shall not equal more than the total monthly rent for the unit, any fees required for occupancy (excluding late fees and pet fees) <b>and</b>, if the tenant pays utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.</p> <p>The only exception to meeting Fair Market Rent &amp; Rent Reasonableness is if the household received assistance with rental arrears only. In which case it must consider whether or not the assistance with rental arrears can reasonably be expected to prevent the household from becoming literally homeless.</p>

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<p>15. Re-certification Documentation</p>	<p>Quarterly re-certifications are required for any household receiving homelessness prevention services through DHCD ESG for more than three months at a time. A quarterly re-certification must be completed through a face to face meeting, recorded in HMIS and must be documented in the case record by:</p> <ul style="list-style-type: none"> <li>• updated income and assets documentation, including a new ESG annual income calculation form</li> <li>• new documentation of insufficient financial resources and support networks (“but for” certification)</li> <li>• clear case notes documenting any changes in household composition</li> </ul> <p>The quarterly re-certification must include a review of all financial documents and a certification by ESG staff that the household continues to lack the resources and support networks necessary to retain housing and that without ESG funding they would become literally homeless.</p> <p>A new quarterly assessment must be completed in HMIS at each re-certification for <u>each</u> household member.</p>
<p>16. Denial/Termination Policies</p>	<p>Each ESG sub-recipient must have a denial*/termination policy in place that meets the following specifications:</p> <ul style="list-style-type: none"> <li>· Must provide written notice to the household containing a clear statement defining the reason for denial or termination</li> <li>· An appeal process, in which the household is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the denial or termination decision</li> <li>· If an appeal is filed, prompt written notice of the final decision to the household must be provided within 15 days.</li> </ul> <p>*A denial notice is only required if a household completes an intake and application and is determined ineligible.</p> <p><u>Denial or termination of ESG services does not bar the program participant from receiving further assistance at a later date if they again meet all ESG eligibility requirements.</u></p>

<p>17. HMIS &amp; DHCD Monthly Reporting Requirements</p>	<p>Active participation in a HUD approved HMIS is required of all successful respondents. Participation includes, but is not limited to, the collection and input of client data at a data quality rate of 90% and completeness (bed coverage/participant coverage) rate of 100%. Participation in a HUD approved HMIS will be documented by producing an Annual Performance Report.</p> <p>Providers may opt to participate in the state’s HMIS, ETO/ASIST or contract at their own expense with an alternate HUD recognized HMIS. However, in cases where there is a lead agency and multiple sub-contracted agencies, DHCD expects that all agencies will enter data into the same system and the same program in order to eliminate any risk of duplicating services to clients.</p> <p>Respondents which use an HMIS other than ETO must agree to conduct regular data uploads to the state’s HMIS. Respondents which use a different platform of ETO, other than ASIST must agree to sync their data. <u>If a sync agreement is not already in place between the responding agency and DHCD, an agreement must be signed prior to execution of a contract.</u></p> <p>The only exception to the HMIS requirement is for organizations with a primary purpose of serving victims of domestic violence or providing legal services. Such organizations are excluded by HUD from HMIS participation. However, each such organization must collect and enter <b>all</b> HUD required data elements into a HMIS comparable database from which the organization can produce reports that meet all HUD and DHCD reporting requirements, including APR’s.</p>
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<p>HMIS &amp; DHCD Monthly Reporting Requirements (Continued)</p>	<p>In addition to entering universal and program level data elements into HMIS, recipients and sub-recipients are responsible for tracking the following data elements and must be prepared to provide this information via Excel to DHCD on a quarterly basis for review.</p> <ul style="list-style-type: none"> <li>• HoH Last Name</li> <li>• HoH First Name</li> <li>• SSN</li> <li>• Household size</li> <li>• Date of ESG enrollment</li> <li>• Date of housing placement, if relocated</li> <li>• Address of unit</li> <li>• Is unit subsidized?</li> <li>• If yes, type of subsidy (Section 8, S+C, PSH, Home &amp; Healthy for Good, VASH, MRVP, Other)</li> <li>• Rental arrears paid (amount)</li> <li>• Rental application fees paid (amount)</li> <li>• Security deposit paid (amount)</li> <li>• Last month's rent paid (amount)</li> <li>• Utility deposits paid (amount)</li> <li>• Utility payments paid (amount)</li> <li>• Moving costs paid (amount)</li> <li>• First month's rent paid (amount)</li> <li>• Is the household expected to receive rental assistance? (up to 3 months, more than 3 months, rental arrears)</li> </ul>
<p>18. Housing Retention</p>	<p>Recipients and sub-recipients are required to track &amp; report on housing retention* for all households that received ESG services at 3, 6, 9, and 12 months after enrollment in the homelessness prevention program (*Housing retention is not to be confused with monthly housing stability case management.) Housing retention tracking may continue for several months after a household has been exited from the program. Respondents must be able to contact either the property owner or the tenant to verify housing retention and collect the following information. This information must be provided to DHCD on a quarterly basis for review via Excel.</p> <ul style="list-style-type: none"> <li>• Date of enrollment</li> <li>• Date of housing retention follow-up</li> <li>• Is the household still in housing?</li> <li>• If yes, do they owe rent?</li> <li>• If no, housing status?</li> <li>• Is the household stably housed?</li> <li>• If no, provide explanation</li> </ul>

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<p>19. Centralized or Coordinated Assessment Systems and Procedures</p>	<p>ESG recipients and sub-recipients should be actively working with their CoC to implement a centralized and coordinated assessment system. Additionally, documentation and evidence of this process should be maintained.</p> <p>Once a centralized and coordinated assessment system has been implemented by the CoC, ESG recipients and sub-recipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.</p> <p>Recipients and sub-recipients are required to work with other mainstream organizations and service providers to connect their program participants to available services across the Commonwealth. ESG services must be provided in close coordination with other services funded by the Commonwealth, including Rental Assistance for Families in Transition (RAFT) &amp; HomeBase, to ensure that no household is left without the necessary resources to prevent homelessness.</p>
<p>20. Conflicts of Interest/ Codes of Conduct</p>	<p>The recipient and its sub-recipients must keep records to show compliance with HUD's organizational conflicts-of-interest requirements, a copy of the personal conflicts of interest policy or codes of conduct, and records supporting exceptions to the personal conflicts of interest prohibitions.</p> <p>DHCD has provided a Draft ESG Code of Conduct which includes a Conflict of Interest Policy which sub-recipients should use unless/until they have an alternate Code of Conduct/Conflict of Interest Policy. If the sub-recipient has its own alternate policy, please send an electronic copy to: <a href="mailto:Elisa.Bresnahan@state.ma.us">Elisa.Bresnahan@state.ma.us</a> for review.</p>
<p>21. Confidentiality</p>	<p>(1) Recipient and its sub-recipients must develop and implement written procedures to ensure:</p> <p>(i) All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;</p>

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<p>Confidentiality (Continued)</p>	<p>(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and</p> <p>(iii) The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.</p> <p>(2) The confidentiality procedures of the recipient and its sub-recipients must be in writing and must be maintained in accordance with this section.</p> <p>Each ESG household must sign a release of information allowing the recipient &amp; sub-recipient to collect and share personal information necessary to prevent homelessness for the household.</p> <p>DHCD has provided a Draft Recipient/Sub-recipient Confidentiality Agreement which sub-recipients should use unless/until they have an alternate specific Confidentiality policy. If the sub-recipient has its own alternate policy, please send an electronic copy to: <a href="mailto:Elisa.Bresnahan@state.ma.us">Elisa.Bresnahan@state.ma.us</a> for review.</p>
<p>22. Sub-recipients and contractors</p>	<p>(1) Sub-recipients with sub-contractors must retain copies of all-solicitations of and agreements with sub-contractors, records of all payment requests by and dates of payments made to sub-contractors, and documentation of all monitoring and sanctions of sub-contractors, as applicable.</p> <p>(2) Sub-recipients and its sub-contractors must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR 85.36 and 24CFR 84.40–84.48.</p> <p>(3) Sub-recipients must ensure that its sub-contractors comply with the recordkeeping requirements specified by DHCD and HUD.</p>

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<p>23. Faith-based activities</p>	<p>The recipient and its sub-recipients must document compliance with the faith-based activities requirements as listed below:</p> <ul style="list-style-type: none"> <li>• Organizations that are directly funded under DHCD’s ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for households.</li> <li>• Any religious organization that receives DHCD ESG funds retains its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use ESG funds to directly support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. An ESG sub-recipient retains its authority over its internal governance, and the organization may retain religious terms in its organization’s name, select its board members on a religious basis, and include religious references in its organization’s mission statements and other governing documents.</li> <li>• A sub-recipient that receives ESG funds shall not, in providing ESG assistance, discriminate against an eligible household on the basis of religion or religious belief.</li> </ul>
<p>24. Other Federal requirements</p>	<p>The recipient and its sub-recipients must document compliance with the Federal requirements, as applicable, including:</p> <ol style="list-style-type: none"> <li>(1) Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under Other Federal Requirements, including data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds and the affirmative outreach requirements.</li> </ol>

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Other Federal Requirements (Continued)	<ul style="list-style-type: none"> <li>(2) Records demonstrating compliance with the uniform administrative requirements in 24 CFR part 85 (for governments) and 24 CFR part 84 (for nonprofit organizations).</li> <li>(3) Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.</li> <li>(4) Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.</li> </ul>
25. Period of Record Retention	Documentation of each household's qualifications for ESG Homelessness Prevention must be retained for 5 years after the expenditure of all funds from the grant under which the household was served. Copies made by scanning, photocopying, or similar methods may be substituted for the original records.